EPA United States Environmental Protection Agency

Region 9 Enforcement and Compliance Assurance Division

Inspection Date(s):	08/18/2022	**Inspection Announced:** No
Time:	**Entry:** 9:37 AM	**Exit:** 2:05 PM
Media:	Air	
Regulatory Program(s)	Stationary Source, CAA Title V, NESHAP	
Company Name:	Republic Services	
Facility or Site Name:	West Contra Costa Sanitary Landfill	
Facility/Site Physical Location:	1 Parr Boulevard, Building C	
(city, state, zip code)	Richmond, CA 94801	
Geographic Coordinates:	(Latitude, Longitude) 37.96805, -122.37623	
Mailing address:	1 Parr Boulevard, Building C	
(city, state, zip code)	Richmond, CA 94801	
County:	Contra Costa County	
Facility/Site Contact:	Ed Baquerizo, PHG	Environmental Manager
	E_ebaquerizo@republicservices.com; 510-970-7248	
Facility/Site Identifier:	(FRS ID) 110034185637	
Media Number:	(ICIS-Air) CABAA00006013A1840	
NAICS:	562211	
SIC:	4911	

Facility/Site Personnel Participating in Inspection:			
Ed Baquerizo, PHG	West Contra Costa Sanitary Landfill	Environmental Manager	E_ebaquerizo@republicservices.com; 510-970-7248
Michael Flanagan	SCS Engineers	Contractor	MFlanagan@scsengineers.com
Jamie Everson	SCS Engineers	Contractor	JEverson@scsengineers.com

Inspector(s):			
Janice Chan	EPA R9 / ENF2-1	Senior Enforcement Officer	Chan.Janice@epa.gov / 415-972-3308
Tyler Holybee	EPA R9 / ENF2-1	Inspector	Holybee.Tyler@epa.gov

Others participating in inspection			
Chris Burford	California Air Resources Board	Air Pollution Specialist	Christopher.Burford@arb.ca.gov; 916-327-4719
Sara Tamber	California Air Resources Board	Air Pollution Specialist	Sara.Tamber@arb.ca.gov; 916-229-0379

Inspection Report Author:	JANICE CHAN Digitally signed by JANICE CHAN Date: 2022.10.11 15:16:07 -07'00'		
Janice Chan	EPA R9 / ENF2-1	Senior Enforcement Officer	Chan.Janice@epa.gov / 415-972-3308

Supervisor Review:	Brahmbhatt, Roshni Digitally signed by Brahmbhatt, Roshni Date: 2022.10.14 14:50:31 -07'00'		
Roshni Brahmbhatt	EPA R9 / ENF2-1	Air Section Manager	Brahmbhatt.Roshni@epa.gov / 415-972-3995

SECTION I – INTRODUCTION

Purpose of the Inspection Objective

The purpose of this on-site Inspection/Site Visit at West Contra Costa Sanitary Landfill ("the Facility" or "the Landfill") was to determine the facility's compliance with applicable stationary source regulatory requirements and prohibited acts promulgated through the Clean Air Act (CAA). Inspectors from EPA Region 9's Air Section of the Enforcement and Compliance Assurance Division accompanied California Air Resources Board (CARB) inspectors when selecting this facility for inspection. The inspection was unannounced.

Opening Conference

EPA Region 9 inspectors Janice CHAN and Tyler HOLYBEE and CARB inspectors Chris BURFORD and Sara TAMBER (collectively "the Inspection Team") arrived at the Facility at 9:37 am on August 18, 2022 for the inspection. Chris Burford led the inspection. We signed-in at the visitor logbook, and met with Ed BAQUERIZO, the Facility's Environmental Manager.

The Facility/site description is based on interviewing Ed Baquerizo during the inspection.

Facility/Site Description

The Facility has two landfills, one Class I landfill for hazardous waste and one Class II landfill for municipal solid waste. In 2011, the Facility closed both landfills. The Class I landfill was capped in 2003.The Class I landfill produces gas that feeds to two horizontal wells. The Class I landfill uses a natural mud floor. Class II landfill holds municipal solid waste, and stopped receiving waste in 2005. The Class II landfill produces gas that feeds to 105 wells, consisting of a mixture of horizontal and vertical wells. The Class II landfill has a slurry wall and a natural mud floor.

The Facility had collected gas for energy product until 2021. It currently does not collect gas. It plans to eventually operate a hydrogen plant for methane collection at an undisclosed time. All the current gas goes to the flare for emission control.

The lines for gas collection from the Class I and the Class II landfills are not connected, though gas meets at the header at the flare station. The Facility has one flare, with a gas flow of approximately 900 scfm and set point at 1602-degrees Fahrenheit. In the event of flare temperature getting too low or pilot light out, the flare station has an auto shutdown system that stops the gas flow to the flare and calls SCS Engineers. The Facility has not experienced a shutdown at the flare station.

SECTION II – OBSERVATIONS

During the inspection, Jamie EVERSON and Michael FLANAGAN, consultants from SCS Engineers, joined us.

The Inspection Team went to the flare station first. The operating temperature of the flare was

1615-degrees Fahrenheit. CARB inspectors detected a leak at the output valve at Blower 1. CARB's toxic vapor analyzer (TVA) measured a reading between 1400 ppm to above 2000 ppm. The wind speed was below CARB's measurement limit. Jamie Everson also measured the leak, and measured readings between 2475 ppm and 7000 ppm. The leak was fixed while the inspection continued at the wells.

The inspection continued at the horizontal wells at the Class I hazardous waste landfill site before going to the horizontal wells at Class II municipal solid waste landfill. CARB's TVA measured a sustained reading over 500 ppm with the highest reading at 1050 ppm at well number 08-40. The inspectors observed cracking around the soil. Ed Baquerizo had informed the inspectors that the Facility put in a benzonite plug around the well the week before due to a leak found during a recent Bay Area Air Quality Management District inspection. CARB measured another leak between 2400 ppm and 4200 ppm at well number 50. The Facility remediated the issues around both wells by wetting the soil with water and compacting it.

In total, CARB measured readings for leak detection at a total of 32 wells and components.

SECTION III – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

CARB Inspectors found leaks that sustained readings over 500 ppm at the flare station and two wells (08-40 and 501) during the site tour. The Facility had staff and SCS contractors remediated the leaks on the spot.

Closing Conference

The closing conference started at 2:00 pm. Chris Burford reiterated that we looked at 32 wells and components, and found leaks at the above mentioned areas of concern, explaining these were deviations, and that remediations were performed on the spot. The Inspection Team left the facility at 2:05 pm.

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

CARB inspectors took photographs of wells and monitoring activities during the inspection. EPA Inspectors used the forward-looking infrared (FLIR) camera to look for potential leaks during the site tour and did not capture any recordings.

SECTION V – DOCUMENTS REQUESTED AND RECEIVED AFTER THE INSPECTION

No documents were requested.

SECTION VI – LIST OF APPENDICES

None